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16 *Attorneys for Defendant and Cross-Defendant*
17 *Pro Marine Technology*

18
19 **IN THE DISTRICT COURT FOR THE**
20 **THE NORTHERN MARIANA ISLANDS**

21 JOHN BRADY BARRINEAU,)	CIVIL ACTION NO. CV05-0028
)	
22 Plaintiff,)	
23 vs.)	
)	PRO MARINE TECHNOLOGY'S
24 PRO MARINE TECHNOLOGY,)	ANSWER TO CROSS-CLAIM OF
25 CABRAS MARINE CORPORATION,)	CABRAS MARINE CORPORATION
)	
26 Defendants.)	

27 **COMES NOW** Cross-Defendant Pro Marine Technology
28 (hereinafter "Cross-Defendant") and in answer to the Cross-
29 claim herein admits, denies and alleges as follows:

30 1. Cross-Defendant admits the allegations contained
31 in paragraphs 1, 3, 4, 6, 7, 8, 9, 11, 12, 13, 14, 15, 16,
32 and 17.

1 2. Cross-Defendant lacks sufficient information and
2 belief to formulate a response to the allegations contained
3 in paragraphs 5 and 10 and, basing its denial thereon,
4 denies generally and specifically each and every allegation
5 contained in said paragraphs.
6

7 3. Cross-Defendant denies generally and specifically
8 each and every allegation contained in paragraph 18.
9

10 **FIRST AFFIRMATIVE DEFENSE**

11 The Cross-claim fails to state a claim or claims upon
12 which relief may be granted.

13 **SECOND AFFIRMATIVE DEFENSE**

14 Cross-Defendant entered into a good faith settlement
15 with the Plaintiff and, as such, any and all claims by
16 Cabras Marine for indemnity or contribution are barred.
17

18 **THIRD AFFIRMATIVE DEFENSE**

19 There is no basis, legal or equitable, upon which
20 Cabras Marine can assert a claim for indemnity against
21 Cross-Defendant.

22 **WHEREFORE,** Cross-Defendant **PRO MARINE TECHNOLOGY** prays
23 judgment as follows:
24

25 1. That Cross-Claimant take nothing by its Cross-
26 claim;

1 2. For costs of suit incurred herein; and

2 3. For such other and further relief as the Court
3 may deem just and proper.
4

5 **BLAIR STERLING JOHNSON**
6 **MOODY MARTINEZ & LEON GUERRERO**
7 **A PROFESSIONAL CORPORATION**
8 **THOMAS C. STERING, CNMI BAR NO. F0127**

9 **THOMAS E. CLIFFORD**
10 **ATTORNEY AT LAW**

11 DATED: SEPTEMBER 18, 2006

12 BY: 

13 **THOMAS E. CLIFFORD,**
14 **CNMI BAR NO. F0210**

15 *Attorneys for Defendant and Cross Defendant*
16 *Pro Marine Technology*

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19 CLAIM OF CABRAS MARINE RE BARRINEAU V PMT.DOC
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